

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE

IN RE: )  
 ) Chapter 11  
W.R. GRACE & CO., et al., )  
 ) Case No. 01-01139 (JKF)  
 ) Jointly Administered  
Debtors. )  
 ) [Related to Docket Nos. 15705, 15713, 15740, )  
 ) 15721, 15730, 15744, ) 15734, 15734, 15723]  
 )  
 ) Objection Date: June 14, 2007  
 ) Hearing Date: June 21, 2007 @ 8:30 a.m.  
 )  
 )

**NOTICE OF MOTION OF CERTAIN LAW FIRMS TO QUASH DEPOSITION  
NOTICES AND FOR A PROTECTIVE ORDER**

On June 5, 2007, Baron & Budd, P.C.; Foster & Sear, L.L.P.; The Law Offices of Peter G. Angelos, A Professional Corporation; LeBlanc & Waddell, LLP; Provost & Umphrey, LLP; Reaud Morgan & Quinn, LLP, Silber Pearlman, LLP; Weitz & Luxenberg, P.C.; and the Williams Bailey Law Firm, L.L.P. (collectively the "Certain Law Firms") filed the Motion To Quash Deposition Notices and For a Protective Order. (the "Motion") with the United States Bankruptcy Court for the District of Delaware, 824 Market Street, Wilmington, Delaware 19801 (the "Bankruptcy Court").

Objections or other responses to the relief requested in the Motion, if any, must be in writing and be filed with the Bankruptcy Court no later than June 14, 2007.

At the same time, you must also serve a copy of the objections or responses, if any, upon the counsel for the Movants, (i) Sander L. Esserman Stutzman, Bromberg, Esserman & Plifka, A Professional Corporation, 2323 Bryan Street, Suite 2200, Dallas, Texas 75201, Telephone: (214) 969-4900, Facsimile: (214) 969-4999, and (ii) Daniel K. Hogan, The Hogan Firm, 1311

Delaware Avenue, Wilmington, Delaware 19806, Telephone: (302) 656-7540, Facsimile: (302) 656-7599. The Motion is scheduled to be heard on June 21, 2007, at 8:30 a.m. prevailing eastern time at the United States Bankruptcy Court, 5414 U.S. Steel Building, 600 Grant Street, Pittsburgh, Pennsylvania 15219. All parties who wish to participate in the hearing are invited to attend in person or by telephone. Any party wishing to appear telephonically at a hearing must make arrangements with CourtCall by phone (866-582-6878) or facsimile (866-533-2946) no later than 12:00 p.m. two business days prior to the hearing. All parties must provide CourtCall with the following information: (a) case name and number, (b) the name of the judge conducting the hearing, (c) the hearing date and time, (d) the participant's name, address and telephone number, (e) the party whom the participant represents, and (f) the matter on which the participant wishes to be heard or whether the participant intends to monitor the proceedings in "listen-only" mode. Additionally, all parties participating via telephone, including those participating in "listen-only" mode, must send notification to the Debtors' Delaware counsel of (i) their intention to participate in the hearing and (ii) the information set forth in (a) through (f) above. Such notice should be sent to Patricia Cuniff of Pachulski Stang Ziehl Young Jones & Weintraub LLP via e-mail [pcuniff@pszyjw.com](mailto:pcuniff@pszyjw.com)) or facsimile (302-652-4400). Attorneys must comply with District Court Local Rule 83.5 in order to schedule a telephonic appearance.

All documents filed with the 'Court (pleadings, transcripts, etc.), and copies of the Motion should be available for inspection (i) at the Office of the Clerk of the Bankruptcy Court, 824 North Market Street, 3rd Floor, Wilmington, DE 19801 or (ii) at <http://pacer.psc.uscourts.gov>. NOTE: A PACER password is required to access documents on the Bankruptcy Court's website, a PACER password may be obtained online at the PACER

website at <http://pacer.psc.uscourts.gov>.

IF NO OBJECTIONS ARE TIMELY FILED AND SERVED IN ACCORDANCE  
WITH THIS NOTICE, THE BANKRUPTCY COURT MAY GET THE RELIEF  
REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: June 5, 2007

/s/Daniel K. Hogan

Daniel K. Hogan (DE #2814)

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